

April 5, 1999

William K. Hubbard  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane. Rm. 1061  
Rockville, MD 20852

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Dear Mr. Hubbard,


The Center for Science in the Public Interest has recently drawn conclusions about *Vibrio vulnificus* in the shellfish industry. This petition to pasteurize post-harvest shellfish should be more readily analyzed and investigated until there is full scientific evidence that *Vibrio* bacteria in shellfish are infecting consumers on the west coast.

There have already been greater restrictions placed on the shellfish industry in 1998. Due to these constraints, illnesses associated with the *Vibrio parahaemolyticus* virus have virtually ceased on the west coast.

Instead of eliminating shellfish marketing, the FDA should spend time researching scientific data so a substantial policy may be formed. As of today, no data exist that would permit the setting of a performance standard. Not enough is known about *Vibrio* viruses or what establishes an infectious dose.

I urge the FDA to provide funding and research necessary to develop appropriate criteria for crafting public health policy while continuing deliberation.

Sincerely,

  
Ron Johansen

98P-0504

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